

REMARKS

Claims 1-11, 13-30, and 32-40 remain in this application. Claims 32-33 and 37-40 have been amended. No new matter has been added. Reconsideration is respectfully requested.

The specification was objected to for having browser-executable code. Applicant has amended paragraphs [0004] and [0008] to remove the code. In view of these amendments, applicant believes the objections are now moot.

Claims 32-34 were rejected under U.S.C. §112 second paragraph as being indistinct. Claim 34 depends from claim 33. Applicant has amended claims 32 and 33 to depend from claim 17; in view of these amendments, applicant requests that the rejections of claims 32-34 be withdrawn.

Claims 37-38 were rejected under U.S.C. §112 second paragraph as being incomplete. Applicant has amended the claims to have as claim elements a system memory and a processor. In view of these amendments, applicant believes that the rejections of claims 37-38 are moot.

Claims 39-40 were rejected under U.S.C. §112 second paragraph as being incomplete. Applicant has amended these claims in accordance with the Examiner's interpretation of the

claims, in section 10 of the Office Action: "The elements of these claims are being interpreted as being performed according to computer instructions encoded on a computer readable medium."

Applicant gratefully acknowledges the telephone interview held by the Examiner with applicant's representative, Daniel Kligler, Registration Number 41120, on January 11, 2006. Applicant also gratefully acknowledges a previous telephone interview of January 10, 2006, held by the Examiner with Daniel Kligler, and with Philip Alper, who was involved in preparing the instant application. The interviews were for clarification of the Background of the Invention (BOTI), as applied by the Examiner in reference to independent claims 1, 17, 37-40. In the interview of January 11, Dr. Kligler pointed out that although BOTI may describe the application of the subset cover technique in order to produce a covering subset of the basic blocks of a program, it does not teach or suggest any connection between this technique and rules that may be used in formal verification of a program. The clarification is described in more detail below. The Examiner agreed to reconsider this point and to conduct a further search of the prior art to the extent that the cited art does not teach the point.

Claims 1-10, 13-28, 30, and 32-36 were rejected under U.S.C. §103(a) over "Coverability Analysis Using Symbolic Model Checking" published by IBM (IBM) in view of BOTI. Applicant respectfully traverses these rejections.

Claims 11 and 29 were rejected under U.S.C. §103(a) over IBM in view of BOTI and further in view of U. S. Patent 5,579,515 to Hintz et al. Applicant respectfully traverses these rejections.

In regard to independent claims 1 and 17, in sections 3 and 4 of the Office Action, and also in section 12, page 9 the Examiner couples the "number of rules less than, by a factor in a range from two to ten, a number of basic blocks" recited in claims 1 and 17 with material in BOTI. However, as explained in the interviews, BOTI does not teach this. Applicant readily agrees that Table II of BOTI does describe a first number of blocks and a second number of blocks (two in {B,C}, five in {A, B, C, D, E}). The Examiner correctly states that the ratio of these numbers is 2.5. However, there is no suggestion whatsoever that this relation or ratio can be applied to the relation or ratio between the number of rules and the number of blocks recited in the claims. This distinction was pointed out and clarified in the interviews.

In view of the patentability of independent claims 1 and 17, applicant believes that dependent claims 2-11, 13-16, 18-30, and 32-36 are also patentable.

Independent apparatus claims 37-38 were rejected under U.S.C. §103(a) over IBM in view of BOTI and further in view of U. S. Patent 6,484,134 to Hoskote. As stated above applicant has amended claims 37 and 38 to have the elements of a memory and a processor. Claims 37 and 38 recite the relation required for claims 1 and 17 between the number of rules and the number of blocks. As argued above for claims 1 and 17, applicant believes that claims 37 and 38 are also patentable.

Independent computer software product claims 39-40 were also rejected under U.S.C. §103(a) over IBM in view of BOTI and further in view of U. S. Patent 6,484,134 to Hoskote. Applicant traverses this rejection. Claims 39 and 40 recite the relation required for claims 1 and 17 between the number of rules and the number of blocks. As argued above for claims 1 and 17, applicant believes that claims 39 and 40 are also patentable.

Applicant has studied the additional prior art made of record by the Examiner. Applicant believes the amended claims in the present patent application to be patentable over


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the cited prior art as well, whether taken alone or in combination with other prior art.

Applicant believes that the above amendments and remarks are fully responsive to all of the objections and grounds of rejection raised by the Examiner. In view of these amendments and remarks, applicant respectfully submits that all of the claims currently pending in the present application are in order for allowance. Notice to this effect is respectfully requested.

Respectfully submitted,

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